

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

KENNETH CURRY, RICARDO MAZZITELLI,  
JACQUELINE BROWN PILGRIM, on behalf of  
themselves and others similarly situated,

Plaintiffs,

-against-

P&G AUDITORS AND CONSULTANTS, LLC; GRC  
SOLUTIONS, LLC; PGX, LLC; AND APPLE  
BANCORP, INC. d/b/a APPLE BANK FOR SAVINGS,

Defendants.

Case No. 20-cv-06985 (LTS) (SLC)

**AFFIDAVIT OF  
MITCHELL JACOBS  
IN SUPPORT OF MOTION  
FOR SUMMARY JUDGMENT**

STATE OF NEW YORK     )  
                                  ) ss. :  
COUNTY OF NEW YORK )

Mitchell Jacobs, being duly sworn, deposes and says:

1. I am the Senior Vice President for Corporate Real Estate of Defendant Apple Bank for Savings, sued herein as Apple Bancorp, Inc. d/b/a Apple Bank for Savings (“Apple Bank” or the “Bank”). I submit this affidavit in support of Apple Bank’s motion for summary judgment.

2. Apple Bank engaged GRC Solutions, LLC (“GRC”) to, independently, test, monitor and validate Apple Bank’s Anti-Money Laundering and Bank Secrecy Act Compliance Program, including the Bank’s suspicious activity monitoring system.

3. This audit work necessarily required GRC employees to access the Bank’s systems.

4. To enable GRC employees to access the Bank’s information technology resources and systems, and to facilitate their work, we provided them, at a Bank branch, with temporary work stations, which were partitioned from the offices and work stations of Apple Bank employees.

5. At times, when GRC employees needed access after the Bank's standard hours of operation, we necessarily provided security to ensure the safety of these invitees.

*Mitchell Jacobs*

MITCHELL JACOBS

Sworn to before me on this  
1st day of December 2020

*Andrea Gallinucci-Martinez*

Notary Public

ANDREA GALLINUCCI-MARTINEZ  
NOTARY PUBLIC, STATE OF NEW YORK  
Registration No. 02GA6407618  
Qualified in New York County  
Commission Expires June 22, 2024